

James Sandnes (JS-8944)  
BOUNDAS, SKARZYNSKI, WALSH & BLACK, LLC  
One Battery Park Plaza, 32nd Floor  
New York, NY 10004  
Ph: (212) 820-7700  
Fax: (212) 820-7740  
jsandnes@bswb.com

*Attorneys for Third Party Defendant Travelers  
Casualty and Surety Company*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
FEDERAL INSURANCE COMPANY,	:	
	:	
Plaintiffs,	:	No. 10 Civ. 1160 (RJS)
	:	
v.	:	
	:	
THE ESTATE OF IRVING GOULD, MEHDI	:	
ALI, ALEXANDER M. HAIG, JR., THE	:	
ESTATE OF RALPH SELIGMAN, BURTON	:	
WINBERG and J. EDWARD GOFF,	:	
	:	
Defendants.	:	
-----X	:	
	:	
THE ESTATE OF IRVING GOULD, MEHDI	:	
ALI, ALEXANDER M. HAIG, JR., THE	:	
ESTATE OF RALPH SELIGMAN, BURTON	:	
WINBERG and J. EDWARD GOFF,	:	
	:	
Third-Party Plaintiffs,	:	
	:	
v.	:	
	:	
CHARTIS INSURANCE COMPANY OF	:	
CANADA (f/k/a American Home Assurance	:	
Company (Canada Branch)) and TRAVELERS	:	
CASUALTY AND SURETY COMPANY (f/k/a	:	
The Aetna Casualty and Surety Company),	:	
	:	
Third-Party Defendants.	:	
-----X	:	

**NOTICE OF THIRD PARTY DEFENDANT TRAVELERS CASUALTY  
AND SURETY COMPANY'S (f/k/a THE AETNA CASUALTY AND SURETY  
COMPANY) MOTION FOR JUDGMENT ON THE PLEADINGS**

PLEASE TAKE NOTICE that, upon the Third Party Complaint in the above-captioned action, the Third Party Defendant, Travelers Casualty and Surety Company's ("Travelers") Memorandum of Law in Support of Motion for Judgment on the Pleadings, the Declaration of James Sandnes, Travelers' Answer to the Third Party Complaint and all other pleadings and proceedings, Travelers will move this Court, before the Honorable Richard J. Sullivan, United States District Judge, at the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, New York 10007, on a date and at a time designated by the Court, for an Order pursuant to Fed. R. Civ. P. 12(c) granting judgment on the pleadings that coverage under Travelers' excess directors and officers liability policy, Policy No. 095 LB 095 000 440 BCA, does not drop down and has not been triggered and granting such other and further relief as may be just and proper.

Dated: New York, New York  
December 15, 2010

BOUNDAS, SKARZINSKI, WALSH &  
BLACK LLC

By: s/  
James Sandnes (JS-8944)

One Battery Park Plaza  
New York, New York 10004  
(212) 820-7700  
jsandnes@bswb.com

*Attorneys for Third-Party Defendant Travelers  
Casualty and Surety Company*